III.   REMARKS

Claims 1-16 are pending in this application, among which, claims 13-16 are withdrawn from consideration. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-12 are rejected under 35 U.S.C. 102(e) as allegedly being anticipated by Brady (USPN 6,633,875). Applicants respectfully traverse this rejection for the reasons that follow.

With respect to independent claims 1, 5, 7 and 10-12, Applicants submit Brady does not disclose, *inter alia*, that "total said data according to a field value defined by said stored grouping function specified in said execution command." (Claim 1, similarly claimed in claims 5, 7-8 and 10-12). In Brady, the data may be grouped based on the static data element (*see*, col. 8, lines 24-26 and col. 10, 20-22). However, the grouping of data based on the static data element is only used to join non-static data elements belonging to the group (*see*, col. 8, lines 25-26). Brady does not include "total[ing] said data according to a field value defined by said stored grouping function[.]" That is, the grouping in Brady is not used in the processing of the data. Please note, joining non-static data elements is not a processing of the data because without the non-static element, the data in Brady is not complete to be processed. Brady does not disclose that the processing of the non-static data element will be different due to the difference in the grouping of the static data element.

In addition, Brady does not disclose, *inter alia*, "a stored grouping function enabled to define a field value used to group said data[.]" In Brady, the static data elements, which are used for grouping, cannot be defined as they "describe the permanent attributes of an asset" and that changes in the static data element will cause the asset "being terminated" and "a corresponding

new asset [being] created". (Col. 10, lines 21-22, 34 and 36). That is, Brady does not include a function to "define" a static data element of an asset.

In view of the foregoing, Brady does not disclose all claim features of the invention, and Applicants respectfully request withdrawal of the rejection.

The dependent claims are believed allowable for the same reasons, as well as for their own additional features.

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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